

# **EXHIBIT G**

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**From:** Eric Winston <ericwinston@quinnemanuel.com>  
**Sent:** Saturday, December 13, 2025 8:12 PM  
**To:** Meehan, Edward J. (EMeehan@groom.com); Nicole K. Pedi  
**Cc:** Maria Kotsiras; Vincent M. DeBella; L. Katherine Good; Andrew C. Ehrmann; Shirley Chan; Casey McGushin; Patrick J. Nash; Christopher Gessner; Meredith Lahaie; Jane M. Leamy; Levin, Samuel (slevin@groom.com); Joseph L. Sorkin; Kevin Zuzolo  
**Subject:** RE: Yellow Corp. - Letter re December 8 Deposition

While I am glad you have accepted our proposal, we will provide you our written requests by no later than Wednesday, December 17, not tomorrow. The hearing is January 21, our objection deadline is January 12, other depositions are scheduled the week of January 5, so there is plenty of time for your client to answer them – we will give you up to a week to answer our questions, though you are free to draft and serve the answers earlier if you desire - and if there are disputes, time to address them.

There is no reason for either side to be jammed.

And, if nothing else, stop trying to impose made-up deadlines or conditions, misrepresenting what MFN “declined” to do, and suggesting what you did at the deposition was remotely appropriate or somehow equivalent to us offering to proceed by deposition upon written question. Do you really think what you citing at pages 97 and 98 makes you look reasonable? Here’s the language for everyone’s benefit:

14· . . . . Can you please state any question  
15· ·where you got an "I don't know" or something  
16· ·like that where you would like an answer?  
17· ·Because we still have, oh, at least another  
18· ·13 to 20 minutes left for you to get  
19· ·answers.· So could you please identify?  
20· . . . . MR. EHRMANN:· Mr. Meehan, I will  
21· ·repeat again that it is the party's  
22· ·obligation to prepare a 30(b)(6) deponent  
prior to the deposition, not during the  
·2· ·deposition.· That is completely  
·3· ·inappropriate.

I highly doubt any further depositions on the schedule will have defending counsel acting in a manner like you did. I am glad that, even though it was his first deposition and it is hard to prepare for something like what happened, Andrew did the right thing, every time.

Just welcome the fact that a different counsel offered a constructive solution that we decided to take to avoid any more noise, and you have accepted as well.

**Eric Winston**  
*Partner*  
**Quinn Emanuel Urquhart & Sullivan, LLP**  
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213-443-3000 Main Office Number  
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**From:** Meehan, Edward J. (EMeehan@groom.com) <EMeehan@groom.com>

**Sent:** Saturday, December 13, 2025 4:46 PM

**To:** Nicole K. Pedi <npedi@potteranderson.com>

**Cc:** Eric Winston <ericwinston@quinnemanuel.com>; Maria Kotsiras <mkotsiras@potteranderson.com>; Vincent M. DeBella <vdebella@pkgdlaw.com>; L. Katherine Good <lkgood@potteranderson.com>; Andrew C. Ehrmann <aehrmann@potteranderson.com>; Shirley Chan <shirley.chan@kirkland.com>; Casey McGushin <casey.mcgushin@kirkland.com>; Patrick J. Nash <patrick.nash@kirkland.com>; Christopher Gessner <cgessner@akingump.com>; Meredith Lahaie <mlahaie@akingump.com>; Jane M. Leamy <jane.m.leamy@usdoj.gov>; Levin, Samuel (slevin@groom.com) <SLevin@groom.com>; Joseph L. Sorkin <jsorkin@akingump.com>; Kevin Zuzolo <kzuzolo@akingump.com>

**Subject:** Re: Yellow Corp. - Letter re December 8 Deposition

[EXTERNAL EMAIL from [emeehan@groom.com](mailto:emeehan@groom.com)]

Eric,

We've reviewed your below e-mail and letter(s) from last night.

We are pleased that MFN has decided to propound its remaining questions in writing so as to resolve our disagreement over the December 8 deposition. As you know, at the deposition, I asked MFN to identify remaining questions on which it "would like an answer . . . [b]ecause we still have [time] left for you to get answers," but MFN counsel declined to do so. See Transcript at 97:14–98:3. Your e-mail indicates that, after talking with Unsecured Creditors Committee counsel yesterday, MFN has decided it is now willing to identify its questions in writing.

Subject to the Fund's right to object to any particular question(s), which we will do succinctly and be prepared to meet and confer in good faith to resolve them, the Fund accepts the proposal.

Please provide us with your Rule 31 questions by no later than tomorrow so that we can review them with the client on Monday and avoid any further delay in getting MFN its answers in this matter. We understand from your letter last night, which followed the e-mail, that the questions have already been drafted. See 12/12 Letter at 2 ("We of course were ready to ask our questions [at the deposition on Monday.]").

Thanks,  
Ed

Sent from my iPhone

On Dec 12, 2025, at 10:12 PM, Pedi, Nicole K. <[npedi@potteranderson.com](mailto:npedi@potteranderson.com)> wrote:

Counsel,

Please see the attached corrected correspondence, which fixes a typographical error in my previous email.

Thanks,  
Nicole

<image894781.png>

Nicole K. Pedi | Counsel

She / Her / Hers

Potter Anderson & Corroon LLP | 1313 N. Market Street, 6th Floor | Wilmington, DE 19801-6108

Office +1 302.984.6043<<tel:+1%20302.984.6043>>

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From: Pedi, Nicole K.

Sent: Friday, December 12, 2025 9:40 PM

To: Eric Winston <[ericwinston@quinnemanuel.com](mailto:ericwinston@quinnemanuel.com)>; Meehan, Edward J. (<[EMeehan@groom.com](mailto:EMeehan@groom.com)>  
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<[SLevin@groom.com](mailto:SLevin@groom.com)>

Subject: RE: Yellow Corp. - Letter re December 8 Deposition

Counsel,

Please see the attached correspondence.

Regards,  
Nicole

From: Eric Winston <[ericwinston@quinnemanuel.com](mailto:ericwinston@quinnemanuel.com)<<mailto:ericwinston@quinnemanuel.com>>>

Sent: Friday, December 12, 2025 6:26 PM

To: Meehan, Edward J. (<[EMeehan@groom.com](mailto:EMeehan@groom.com)<<mailto:EMeehan@groom.com>>>  
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Cc: Pedi, Nicole K. <[npedi@potteranderson.com](mailto:npedi@potteranderson.com)<<mailto:npedi@potteranderson.com>>>; Kotsiras, Maria <[mkotsiras@potteranderson.com](mailto:mkotsiras@potteranderson.com)<<mailto:mkotsiras@potteranderson.com>>>; Vincent M. DeBella <[vdebella@pkgdlaw.com](mailto:vdebella@pkgdlaw.com)<<mailto:vdebella@pkgdlaw.com>>>; Good, L. Katherine <[kgood@potteranderson.com](mailto:kgood@potteranderson.com)<<mailto:kgood@potteranderson.com>>>; Ehrmann, Andrew C. <[aehrmann@potteranderson.com](mailto:aehrmann@potteranderson.com)<<mailto:aehrmann@potteranderson.com>>>; Shirley Chan <[shirley.chan@kirkland.com](mailto:shirley.chan@kirkland.com)<<mailto:shirley.chan@kirkland.com>>>; Casey McGushin <[casey.mcgushin@kirkland.com](mailto:casey.mcgushin@kirkland.com)<<mailto:casey.mcgushin@kirkland.com>>>; Patrick J. Nash <[patrick.nash@kirkland.com](mailto:patrick.nash@kirkland.com)<<mailto:patrick.nash@kirkland.com>>>; Christopher Gessner <[cgressner@akingump.com](mailto:cgressner@akingump.com)<<mailto:cgressner@akingump.com>>>; Meredith Lahaie <[mlahaie@akingump.com](mailto:mlahaie@akingump.com)<<mailto:mlahaie@akingump.com>>>; Jane M. Leamy <[jane.m.leafy@usdoj.gov](mailto:jane.m.leafy@usdoj.gov)<<mailto:jane.m.leafy@usdoj.gov>>>; Levin, Samuel (<[slevin@groom.com](mailto:slevin@groom.com)<<mailto:slevin@groom.com>>>  
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Subject: [EXT] RE: Yellow Corp. - Letter re December 8 Deposition

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Monday afternoon is fine for a meet and confer.

We want to get answers to the questions on the four topics, for which you agreed to produce a corporate representative, that Andrew was unable to get because of what occurred at the deposition. Read the topic list and look at the transcript from the December 5, 2025 status conference – Judge Goldblatt indicated what he wants and every deposition topic goes to giving him the evidentiary gaps that currently exist.

But I note that Mr. Sorkin suggested to me today a constructive solution – we would just prepare a list of

questions and treat the list as a Rule 31 deposition by written questions. While not as ideal as a live deposition, it would, at minimum, eliminate the clutter of speaking objections and speeches on matters wholly unrelated to the question posed. And it would give your witness sufficient time to prepare his answer.

For example, this question is a pretty easy one to answer:

“According to page 1 of the document counsel prepared for you and you read from during your deposition, ‘[t]he Fund has been recused from all Committee discussions and votes regarding: (i) objections and potential objections to multiemployer plan claims; and (ii) settlements or potential settlements of multiemployer plan claims.’ But according to the minutes produced to us for Committee meetings on 11/13/24, 12/4/24, 1/8/25, and 10/15/25, a representative of New York Teamsters attended each meeting, was never recused, and in each meeting MEPP claim objections and/or settlements were discussed. For each of these four minutes, are the minutes accurate in that New York Teamsters attended, was not recused, and MEPP claim objections and/or settlements were discussed?”

Depending on the answer to the question, there likely would be follow up.

Let us know if proceeding under Rule 31 is acceptable. Otherwise, you will get a written response to your e-mail.

Eric Winston

Partner

Quinn Emanuel Urquhart & Sullivan, LLP

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From: Meehan, Edward J. ([EMeehan@groom.com](mailto:EMeehan@groom.com)<<mailto:EMeehan@groom.com>>)

<[EMeehan@groom.com](mailto:EMeehan@groom.com)<<mailto:EMeehan@groom.com>>>

Sent: Friday, December 12, 2025 1:17 PM

To: Eric Winston <[ericwinston@quinnemanuel.com](mailto:ericwinston@quinnemanuel.com)<<mailto:ericwinston@quinnemanuel.com>>>

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Subject: Re: Yellow Corp. - Letter re December 8 Deposition

[EXTERNAL EMAIL from [emeehan@groom.com](mailto:emeehan@groom.com)<<mailto:emeehan@groom.com>>]

Eric,

Would Monday afternoon work for a meet and confer? To make it most productive, could you please specify as precisely as possible today what you wish to discuss and also provide today the response to my e-mail from yesterday that Nicole indicated would be sent "under separate cover"?

Andrew,

I'm happy to talk with you at any time. My cell phone is (703) 627-8913.

Have a good weekend all.

Sent from my iPhone

On Dec 12, 2025, at 11:59 AM, Eric Winston

<[ericwinston@quinnemanuel.com](mailto:ericwinston@quinnemanuel.com)<<mailto:ericwinston@quinnemanuel.com>>> wrote:

You "noted" many things at the deposition that were legally wrong, which Andrew correctly and cogently addressed on the record . We look forward to bringing to Judge Goldblatt's attention should your client not agree to a continued deposition. And your "noting" was done with a surprising lack of civility. So in that sense you are correct I am missing why you decided to act that way. I am hoping you will apologize to Andrew for your conduct, but I am not expecting such grace.

I just don't want to short-change the reporter, who works very hard. That appeared to be what you were expecting to happen by playing silly games over an invoice. Maybe at least now in that respect there is common ground.

I believe my co-counsel has requested a meet and confer.

Eric Winston

Partner

Quinn Emanuel Urquhart & Sullivan, LLP

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From: Meehan, Edward J. ([EMeehan@groom.com](mailto:EMeehan@groom.com)<<mailto:EMeehan@groom.com>>)

[EMeehan@groom.com](mailto:EMeehan@groom.com)

Sent: Friday, December 12, 2025 8:49 AM

To: Eric Winston <[ericwinston@guinnemanuel.com](mailto:ericwinston@guinnemanuel.com)<<mailto:ericwinston@guinnemanuel.com>>>

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Subject: Re: Yellow Corp. - Letter re December 8 Deposition

[EXTERNAL EMAIL from

[emeehan@groom.com](mailto:emeehan@groom.com)<<mailto:emeehan@groom.com><<mailto:emeehan@groom.com>%3cmailto:emeehan@groom.com>>>>]

Hi Eric,

You're missing it. We noted at the deposition that MFN would provide the witness copy. Now, another new position, pushing more costs towards the Fund.

We'll deal with it.

Sent from my iPhone

On Dec 11, 2025, at 7:32 PM, Eric Winston

[ericwinston@quinnemanuel.com](mailto:ericwinston@quinnemanuel.com) wrote:





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([slevin@groom.com](mailto:slevin@groom.com)<<mailto:slevin@groom.com><<mailto:slevin@groom.com><<mailto:slevin@groom.com>>>>>)  
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Subject: Re: Yellow Corp. - Letter re December 8 Deposition

[EXTERNAL EMAIL from

[emeehan@groom.com](mailto:emeehan@groom.com)<<mailto:emeehan@groom.com><<mailto:emeehan@groom.com><<mailto:emeehan@groom.com><<mailto:emeehan@groom.com>>>>>>>>>]

Thanks Nicole. I'll forward you the court reporter invoice we received - even tho we did not order a transcript - so MFN can pay it.

Sent from my iPhone

On Dec 11, 2025, at 6:51 PM, Pedi, Nicole K.

[npedi@potteranderson.com](mailto:npedi@potteranderson.com)<<mailto:npedi@potteranderson.com><<mailto:npedi@potteranderson.com><<mailto:npedi@potteranderson.com><<mailto:npedi@potteranderson.com>>>>>>>>> wrote:

Hi Ed,

A copy of the transcript is attached here. Obviously, we're fine with providing you a copy of the transcript so the deponent can review it in accordance with Federal Rule 30(e)(1). But to be clear, there is nothing in the Federal Rules that obligates MFN to furnish a copy of the transcript that is readily available to you from the Court Reporter, so any suggestion that we "owe" you a copy or have somehow violated a "duty" to provide you a copy of the transcript is baseless and not well taken. All this seems to accomplish is taking money out of the pocket of the Court Reporter.

Nonetheless, you now have a copy of the transcript. We will respond to the remaining allegations in your email under separate cover. But please provide your availability for a meet and confer so we can get one scheduled this week.

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Sent: Thursday, December 11, 2025 5:09 PM

To: Kotsiras, Maria

<[mkotsiras@potteranderson.com](mailto:mkotsiras@potteranderson.com)<<mailto:mkotsiras@potteranderson.com><<mailto:mkotsiras@potteranderson.com>%3c<mailto:mkotsiras@potteranderson.com>%3c<mailto:mkotsiras@potteranderson.com>%3c<mailto:mkotsiras@potteranderson.com>>>>>>>>>; Vincent M. DeBella

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Cc: Eric Winston

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Subject: [EXT] RE: Yellow Corp. - Letter re December 8 Deposition

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Thanks Maria.

Hi Eric and MFN team,

We've only had a chance to review your lengthy letter from today briefly but wanted to get right back to you with a preliminary response.

While you're reviewing, please provide us a copy of the transcript, which you owe us and we have previously asked for, today.

#### 1. MFN's bad faith

You served a deposition subpoena with no prior notice. No meet and confer. We agreed to proceed on the date you selected. Now, you complain you weren't ready to proceed. And you seem to be looking for excuses for your failures and to delay these proceedings.

You identified four topics with the subpoena. You elected not to ask any questions on two of the four topics. We stated, and confirmed without any disagreement from MFN, that those two topics are waived.

When we spoke on December 3, I told you we understood that the Committee viewed its deliberations as privileged and protected from discovery and that the NYST Fund views its own analysis of the legal issues underlying the decision to support the proposed settlements as likewise privileged. I confirmed this in writing.

Nonetheless, I told you we would cooperate as best we can and would be willing to go “question by question” to see what information the Fund could provide without invading privilege. You accepted that and we spent considerable time preparing for the deposition.

You wasted our time and cost the Fund fees.

## 2. MFN’s failure to ask questions within the topics

In addition to deciding to force the Fund to prepare to address four topics but then not ask any questions about two of them, MFN asked almost nothing within the scope of the other two topics. As we discussed on December 3 and as I confirmed in writing, the Fund understood the deposition to concern Committee deliberations (privileged per its counsel) and the Fund’s views about why it supports the MEPP settlements (likewise privileged in concept but perhaps with room to explore).

At no time during our December 3 call did you say you wanted to delve into the Fund’s claims. Further, at no time prior to the deposition did you subpoena the Fund on the topics you say now you expected and complain you didn’t get—“namely: what was the magnitude of New Teamsters’ (sic) proposed settled claim relative to Judge Goldblatt’s existing rulings concerning the New York Teamsters’ withdrawal liability; the methodology for calculating the liquidated damages claim that New York Teamsters asserts; the reasonableness of the issues being compromised, including New York Teamsters informing anyone else of its views and New York Teamsters’ understanding of the effect of settlements on recoveries to other non-settling stakeholders; and New York Teamsters’ views of and basis for the costs of continued litigation.”

It would take a mind reader to discern these topics from what MFN subpoenaed and ignores the topics you did subpoena. There is no duty to guess at what you wanted. You are misstating your own subpoena topics.

Even so, we managed to give you much of this, to the extent that MFN decided to ask.

It was inexcusable for MFN to delve into what your letter today says you wanted to know about the Fund’s claims. On our December 3 call, you admitted that the Fund’s claims track the court’s rulings, with some debate about measuring the liquidated damages (against the withdrawal liability as assessed or as allowed).

We'll bring MFN's admissions of December 3 to the court's attention (along with the details of MFN's settlement demands during this case as its price for ceasing litigation) since I know (as was confirmed numerous times on the record of the deposition) that MFN does not believe there is any restriction on placing the details of settlement discussions—despite our explicit prior agreements to the contrary—on the public record.

3. MFN's refusal to proceed, fundamental misunderstanding of an entity deposition and endorsement of how the Fund conducted itself

Though you complain now you didn't get answers you were seeking, that's your own fault (if even true). You shut the deposition down (just like how you walked out of the in-person New York settlement meeting when your demands weren't met). We asked you repeatedly on the record to ask MFN's questions. And promised to get you any non-privileged answers on the spot.

You misapprehend the federal rules governing entity depositions. You complain that counsel provided the witness a set of materials and points in writing ("stunning" you say). Apparently, you haven't spoken with your co-counsel who attended the last deposition of the Fund where—with no objection from MFN or anyone else—we followed this same (and long held) practice. And MFN didn't complain at this deposition either, until your untimely letter.

Indeed, MFN multiple times accepted my offer to remind or supply the witness of information to put on the record (as is routinely done in this context) right up until MFN's four lawyers at the deposition insisted on taking a break and returned to say you were shutting down the deposition.

Your letter is pretextual. We urge you to withdraw it and instead discuss with us in good faith what, if anything, MFN truly believes it still needs from the Fund and how best we might provide it at minimum additional cost to all.

4. Please meet your duty to give us the witness copy of the transcript

Obviously, you have the transcript, which is cited repeatedly in, but not attached to, your letter. Under Federal Rule 30, and per my statement on the deposition record, the Fund is exercising its right to read and sign (and to make any corrections or changes as part of this process). But you haven't given us the witness copy, despite prior requests. Please do so now today. That will also allow us to review it for any areas where we might be

Edward J. Meehan  
Principal

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DeBella

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Cc: Eric Winston

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